

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ANDRICA CAGE, as Personal
Representative of the ESTATE OF
SAMUEL STERLING, (*deceased*),

Plaintiff,

v.

BRIAN KEELY,
in his individual capacity, and
THE UNITED STATES OF AMERICA,

Defendants.

Case No: 1:25-cv-00089

Hon. Hala Y. Jarbou
Chief United States District Judge

Hon. Maarten Vermaat
United States Magistrate Judge

**STIPULATION TO EXTEND DEFENDANTS' DEADLINE
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff and Defendants, Brian Keely, in his individual capacity, and the United States of America, stipulate and agree to extend the Defendants' deadline to respond to Plaintiff's Complaint through June 30, 2025. In support of their stipulation, the parties state as follows:

1. Plaintiff initiated this action on January 25, 2025. (Compl., ECF No. 1, PageID.1–14.)
2. Defendant, the United States of America, filed a certification confirming that Brian Keely was, at the time of the incident giving rise to Plaintiff's claims, acting within the scope of a federal office or employment with the United States Marshals Service. (Cert., ECF No. 7, PageID.22–23.)
3. As a result of the certification, the Court entered an order substituting the United States of America in place of Brian Keely with respect to Plaintiff's tort claims against Keely.

(Order, ECF No. 9, PageID.27.)

4. On April 1, 2025, the Court extended Defendants' deadline to respond to Plaintiff's Complaint to May 15, 2025. (Order, ECF No. 13, PageID.46.)

5. Additionally, Defendant Keely has requested Department of Justice representation, pursuant to 28 C.F.R. § 50.15(a), for the individual capacity claims set forth against him in the Complaint. Defendants are still awaiting a decision on his request.

6. Therefore, the parties agree to a forty-five (45) day extension through June 30, 2025.

Respectfully submitted,

Dated: May 9, 2025

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**ORDER EXTENDING DEFENDANTS' DEADLINE
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Upon consideration of the parties' stipulation to extend Defendants' deadline to respond to
Plaintiff's Complaint,

IT IS HEREBY ORDERED that Defendants' deadline to answer or respond to Plaintiff's
Complaint is extended to June 30, 2025.

/s/ Hala Y. Jarbou

HALA Y. JARBOU
Chief United States District Judge

Dated: May 13, 2025